

JOINT STATUS REPORT PURSUANT TO RULE 26(f)

Caption: **Sholeka Hill and Charles Fulkner v. 7-Eleven, Inc.** Civil Action No.: **2:22-cv-1845**

Basis of Jurisdiction: **Diversity**

Jury trial: **X** Non-Jury Trial: _____ Arbitration: _____

Plaintiffs' Counsel participating in the Rule 16 Conference: **Michael A. Pileggi**

Defendant's Counsel participating in the Rule 16 Conference: **Robert W. Stanko/Andrew C. Goldstein**

Do counsel have full authority to settle at Rule 16 Conference: **Yes**

If not, client with such authority who will attend conference: **N/A**

When did the parties hold the Rule 26 Conference: **5/31/2022**

When did the parties comply with Rule 26(a)'s duty of self-executing disclosures:

Plaintiffs: **Forthcoming** / Defendant: **Forthcoming**

Does either side expect to file a case-dispositive motion? **Yes** (yes/no)

If yes, under what Rule **56**

If yes, specify the issue **Notice**

Proposed Deadline for filing dispositive motions: **30 days after Plaintiffs' expert disclosures.**

Does either side anticipate the use of experts? **Yes**

If yes, what is the proposed deadline for expert discovery? **Plaintiffs – 30 days after close of discovery. Defendant – 30 days after Plaintiff's expert disclosures.**

Approximate date the case should be trial ready:

Time for the plaintiff's case: **2 days** Time for the defendant's case: **1 day**

Is a settlement conference likely to be helpful? **Yes** If so, when:

Early **No** (yes/no) After Discovery **Yes** (yes/no)

Do the parties wish to proceed before a Magistrate Judge for final disposition? **No**

Plan for Discovery:

1. The parties anticipate that discovery should be completed in **120** days.
2. What is the minimum amount of time necessary to complete discovery prior to an ADR session, should one be ordered or agreed to? **The parties agree to participate in a settlement conference following the exchange of expert reports.**
3. Have the parties discussed issues relating to claims of privilege or of protection as trial-preparation material, as required by Rule 26(f)(3)(D)? **N/A**

4. Identify any other discovery issues which should be addressed at the Rule 16 Conference, including limitations on discovery, protective Orders needed, or other elements which should be included in a particularized discovery plan: N/A

5. If you contend the discovery period should exceed 90 days, please state the reason:

N/A

6. Do the parties anticipate the need to subpoena any third parties? Yes

If yes, to the extent any authorizations or releases are required to be signed, counsel should exchange them in advance of the Rule 16 Conference.

**SALTZ MONGELUZZI
& BENDESKY, P.C.**

BY: /s/ Michael A. Pileggi
Michael A. Pileggi, Esquire
Attorney for Plaintiffs,
Sholeka Hill and
Charles Fulkner

**MARSHALL DENNEHEY WARNER
COLEMAN & GOGGIN**

BY: /s/ Robert W. Stanko
Robert W. Stanko, Esquire
Andrew C. Goldstein, Esquire
Attorneys for Defendant,
7-Eleven, Inc. (also incorrectly
identified as 7-Eleven)